

DEPARTMENT OF HEALTH AND ENVIRONMENTAL SCIENCES

AIR QUALITY BUREAU



TED SCHWINDEN, GOVERNOR

COGSWELL BUILDING

STATE OF MONTANA

(406) 444-3454

HELENA, MONTANA 59620

October 4, 1988

Mr. Ken Reick
Columbia Falls Aluminum Company
P.O. Box 10
Columbia Falls, MT 59912

Dear Mr. Reick:

This letter is to follow up on our discussion regarding the paste plant stack which took place at our meeting in Helena on September 27, 1988. At that time, you said the company was evaluating four separate control options and asked the Air Quality Bureau to send a letter explaining what was needed in a compliance plan and to list any dates that are required to be met.

EPA's enforcement schedule starts 30 days following the observance of a potential violation. Then after the clock starts, the Montana Department of Health and Environmental Sciences (MDHES) is required to notify the company in writing of the violation within 45 days. We feel the citation fulfills this requirement. EPA requires the company to either be in compliance or on an enforceable MDHES administrative or judicial order within 120 days. With the initial 30 days, this gives us about 150 days to resolve the issue.

The paste plant stack was observed to be in violation of the Montana opacity standard on July 27, 1988. This would mean the enforcement schedule would start on August 26. The time to be in compliance or on an order would be December 24, 1988.

Your plan can be any legal action by the company which will bring the source into compliance with the opacity standard. It can be as simple as a schedule or work practice change, or it may involve the purchase of new control equipment. In this case, the purchase and installation of new control equipment will probably take longer than the December 24 deadline allows. Therefore, an MDHES administrative order will be necessary. The Air Quality Bureau requests that you finalize your plans and submit them to this office by December 1, 1988. This should allow our office time to write an acceptable order and get our legal office to review it prior to the EPA deadline. Be sure to give yourself enough time for delivery and installation of any new equipment. The bureau would like to see a final test for compliance prior to December, 1989.

Mr. Ken Reick
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Thank you for your attention to this matter.

Sincerely,


Warren Norton
Environmental Specialist

WN:jm

MC LWS
 TFP
 HBL
 RJS
 ABB
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 DFR